

NEW YORK  
LONDON  
SINGAPORE  
PHILADELPHIA  
CHICAGO  
WASHINGTON, DC  
SAN FRANCISCO  
SILICON VALLEY  
SAN DIEGO  
SHANGHAI  
BOSTON  
HOUSTON  
LOS ANGELES  
HANOI  
HO CHI MINH CITY

# Duane Morris

FIRM and AFFILIATE OFFICES

ANTHONY J. COSTANTINI  
DIRECT DIAL: +1 212 692 1032  
PERSONAL FAX: +1 212 202 4715  
E-MAIL: AJCostantini@duanemorris.com

[www.duanemorris.com](http://www.duanemorris.com)

ATLANTA  
BALTIMORE  
WILMINGTON  
MIAMI  
BOCA RATON  
PITTSBURGH  
NEWARK  
LAS VEGAS  
CHERRY HILL  
LAKE TAHOE  
MYANMAR  
OMAN  
*A GCC REPRESENTATIVE OFFICE  
OF DUANE MORRIS*

MEXICO CITY  
ALLIANCE WITH  
MIRANDA & ESTAVILLO  
SRI LANKA  
ALLIANCE WITH  
GOWERS INTERNATIONAL

November 17, 2022

## VIA ECF

Honorable Andrew L. Carter Jr.  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: Lovati et al v. The Bolivarian Republic of Venezuela, 19-cv-4793-ALC-VF  
Lovati et al v. The Bolivarian Republic of Venezuela, 19-cv-4796-ALC-VF**

Your Honor:

We represent the Plaintiffs in the above-captioned actions and we filed motions for summary judgment on August 18, 2022. The Defendant's Opposition is due tomorrow, November 18, which we consented to and you approved.

We have conferred with Defendant's counsel, who after confirming that the opposition would be filed on November 18, agreed to consent to Plaintiffs' Reply being due Friday, December 9, 2022. This is the first extension we have requested and we respectfully request your approval to the agreed upon schedule. Thank you for your consideration.

Very truly yours,

/s/ Anthony J. Costantini  
Anthony J. Costantini

AJC/gg

cc: Kent A. Yalowitz, Esq.  
Stephen Wirth, Esq.  
Rudolph Joseph Di Massa, Esq.  
Nathan Abramowitz, Esq.  
David T. McTaggart, Esq.

DUANE MORRIS LLP

1540 BROADWAY NEW YORK, NY 10036-4086  
DM39221921.1

PHONE: +1 212 692 1000 FAX: +1 212 692 1020